

August 21, 2017

(Via Electronic Filing)

Honorable Michael Hammer, U.S.M.J.
United States District Court, District of New Jersey
M. L. King, Jr. Federal Bldg. & U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

Re: Rodney Roberts v. City of Newark, et al. Civil
Action No. 15-cv-7061

Dear Judge Hammer:

The undersigned represents Defendants City of Newark and retired Newark Police Detective, Derrick Eutsey. Please consider this letter as Defendants' application for an extension of time to file a joint status letter.

Your Honor indicated at the status conference that was held before Your Honor on July 25, 2017, that the parties must resolve all discovery disputes by August 31, 2017. You also instructed the parties to meet and confer and to submit a joint status letter by said date. Please note that counsel for Plaintiff and I have met and conferred via telephone over the course of several days for at least five (5) hours. We are trying to resolve as many issues as possible and have made some progress.

Please note that due to the passage of time of the incident which is the subject of this lawsuit, a lot of the people involved on behalf of the City and who have relevant information, are no longer employed by the City. Additionally, there are a lot of documents that have not been located. Defendants have retained the services of an investigator to find some former employees whose whereabouts are currently unknown. Defendants respectfully asks the court for an extension of time of at least two-weeks. Defendants will continue making a good faith attempt to obtain the discovery that remains outstanding, and/or the proper affidavits, if such evidence does not exist.

I have the consent of Plaintiff's attorney for this request.

We thank Your Honor for the Court' s time and consideration regarding this matter.

Respectfully submitted,
KENYATTA K. STEWART
ACTING CORPORATION COUNSEL

By: / s Emilia Perez
Emilia Perez, Esq.
Assistant Corporation Counsel

Cc: Mirel Fisch, Esq.